

Francis J. Lawall (FL 0972)
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS, INC., et al., : Case No. 08-13555 (JMP)
: :
Debtors. : Jointly Administered
:

**SECOND AMENDED VERIFIED STATEMENT OF PEPPER HAMILTON LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pepper Hamilton LLP (“Pepper”), as counsel to the parties designated herein,
hereby submits this second amended verified statement pursuant to Rule 2019 of the Federal
Rules of Bankruptcy Procedure, and states as follows:

1. Pepper has been retained and is currently representing various creditors
and parties in interest (collectively, the “Entities”) in these jointly administered chapter 11 cases.
Some or all of the Entities may hold claims against the Debtors. The Entities are listed on
Exhibit A, which is attached hereto and made a part hereof.

2. Each of the Entities has requested that Pepper represent them in the
Debtors’ chapter 11 cases.

3. Upon information and belief, as of the date hereof, Pepper does not hold
any claims against or any interest in the Debtors.

4. The Entities currently hold or will hold unsecured pre-petition claims, rejection damage claims and/or administrative priority claims. The full amount of each of the Entities' claims is undetermined at this time.

5. Pepper reserves the right to revise and supplement this statement as necessary.

I, Francis J. Lawall, hereby certify that this Verified Statement is true and accurate to the best of my knowledge, information, and belief.

Dated: March 31, 2011

PEPPER HAMILTON LLP

By: /s/ Francis J. Lawall
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EXHIBIT A

1. EnCana Corporation and EnCana Oil & Gas Partnership
Box 28560
Calgary, AB T2P 2S5, Canada
2. ING Bank, FSB
ING Direct - Legal Department
802 Delaware Avenue
10th Floor, Wilmington, DE 19801
3. ExxonMobil Gas Marketing Europe Limited
ExxonMobil House
Ermy Way
Leatherhead KT22 8UX
United Kingdom